

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

RURAL COMMUNITY WORKERS ALLIANCE  
and JANE DOE,

Plaintiffs,

vs.

SMITHFIELD FOODS, INC. and SMITHFIELD  
FRESH MEATS CORP.,

Defendants.

Case No. 5:20-cv-06063-DGK

**DEFENDANTS' MOTION TO DISMISS, OR IN THE ALTERNATIVE TO STAY,  
BASED ON PRIMARY JURISDICTION AND/OR BURFORD ABSTENTION**

Come now Defendants, Smithfield Foods, Inc. and Smithfield Fresh Meats Corp., by and through counsel, and move this Court to dismiss Plaintiffs' Complaint, or in the alternative stay this proceeding, for the reasons set forth in Defendants' Suggestions in Support.

**SMITHFIELD FOODS, INC. and  
SMITHFIELD FRESH MEATS CORP.**

By: /s/ Jean Paul Bradshaw II  
Jean Paul Bradshaw II (#31800)  
Mara Cohara (#51051)  
**Lathrop GPM LLP**  
2345 Grand Boulevard, Suite 2200  
Kansas City, Missouri 64108  
Telephone: (816) 460-5507  
Facsimile: (816) 292-2001  
jeanpaul.bradshaw@lathropgpm.com  
mara.cohara@lathropgpm.com

Alexandra B. Cunningham (*admitted PHV*)  
**Hunton Andrews Kurth LLP**  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219-4074  
Telephone: (804) 787-8087  
Facsimile: (804) 788-8218

acunningham@HuntonAK.com

Susan F. Wiltsie (*admitted PHV*)

**Hunton Andrews Kurth LLP**

2200 Pennsylvania Avenue, NW

Washington, District of Columbia 20037

Telephone: (202) 955-1500

Facsimile: (202) 778-2201

*Counsel for Defendants*

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of April, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of the same to the following counsel of record:

Gina Chiala (#59112)  
**Heartland Center for Jobs and Freedom, Inc.**  
4047 Central Street  
Kansas City, MO 64111  
Telephone: (816) 278-1092  
Facsimile: (816) 278-5785  
ginachiala@jobsandfreedom.org

David S. Muraskin (*admitted pro hac vice*)  
Karla Gilbride (*admitted pro hac vice*)  
Stevie K. Glaberson (*admitted pro hac vice*)  
**Public Justice**  
1620 L. Street, NW, Suite 630  
Washington, DC 20036  
Telephone: (202) 797-8600  
Facsimile: (202) 232-7203  
dmuraskin@publicjustice.net  
kgilbride@publicjustice.net  
sglaberson@publicjustice.net

I hereby certify that I will send copies of the foregoing via electronic mail to Plaintiffs' counsel who have pending motions to appear *pro hac vice*:

David Seligman (*pro hac vice pending*)  
Juno Turner  
**Towards Justice**  
1410 High Street, Suite 300  
Denver, CO 80218  
Telephone: (720) 441-2236  
Facsimile: (303) 957-2289  
david@towardsjustice.org  
juno@towardsjustice.org

***Counsel for Plaintiffs***

/s/ Jean Paul Bradshaw II  
An Attorney for Defendants